Kentucky Waterways Alliance
Healthy waterways.
Healthy communities.

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*Working to Protect, Restore, and Celebrate Kentucky's Waterways*

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September 23, 2026

USDA Forest Service
Director, Public Benefits
Public Comment on Travel Management, National Forest System Lands
Docket FS-2026-0100

**RE: Docket FS-2026-0100 – Notice of Intent to Prepare an Environmental Impact Statement**
- **Forest Service Travel Management Regulations**

Dear Forest Service Officials,

Kentucky Waterways Alliance requests the Forest Service retain enforceable watershed protections, designated motor vehicle routes, and meaningful public participation in any revision of its travel management regulations. The environmental impact statement should evaluate an alternative that improves mapping, accessibility, and maintenance while preserving national standards for minimizing damage to soil, water, and wildlife habitat.

KWA's mission is to protect, restore, and celebrate Kentucky's waterways. Our work connects clean water policy, watershed planning, restoration, and community participation. Travel management directly affects this mission because roads, trails, drainage structures, and stream crossings influence water quality and access to the waters Kentuckians fish, paddle, swim, and depend upon.

We recognize the value of dependable roads and trails for recreation, emergency response, forest management, and access for people with disabilities. Well maintained routes help families reach fishing areas, boat launches, campgrounds, and public lands. Their long-term usefulness depends on protecting the watersheds and recreational resources they serve.

The notice proposes removing national minimization criteria, establishing a presumption favoring access, and changing procedures for future travel decisions. It also states existing motor vehicle designations would remain in effect until revised. KWA's concern is how the proposed framework would influence subsequent decisions and any exemptions taking effect directly under a final rule.

KWA requests the following provisions and analyses:

1. **Retain enforceable damage minimization standards.** Preserve national criteria addressing soil, watershed, vegetation, and wildlife damage, with documented application to individual decisions under 36 CFR 212.55. The existing designation criteria expressly address these concerns. Any replacement should provide equally clear, enforceable protection and explain how compliance will be measured. Require monitoring and prompt corrective action when erosion, sediment delivery, or habitat damage occurs.

2. **Keep motor vehicle use tied to affirmative route designations.** Require review and a public notification and participation process before opening an unauthorized, abandoned, or previously closed route. A visible track or historic roadbed should establish only the presence of a physical feature. Its suitability for public motor vehicle use requires evaluation of water impacts, legal access, safety, maintenance, and other uses. KWA strongly supports maintaining the designated route framework and is opposed to the proposed access presumption and removal of minimization criteria.

3. **Match the transportation system to maintenance capacity.** Retain the minimum road system requirement or an equally protective standard grounded in demonstrated access needs, environmental protection, and realistic funding. Include drainage maintenance, crossing replacement, storm repairs, enforcement, and eventual restoration in cost estimates. Prioritize repair of essential routes and treatment of routes delivering sediment to streams. Preserve the ability to decommission unnecessary roads. Existing regulations already connect road system planning with environmental impacts and maintenance affordability within 36 CFR 212.5.

4. **Require protective conditions for travel beyond designated routes.** Any authorization for game retrieval, dispersed camping, or firewood collection should specify where, when, and under what conditions motorized use may occur. Exclude sensitive streambanks, wetlands, springs, and unstable or saturated soils. Evaluate whether repeated trips could establish new routes or concentrate runoff. Preserve prompt seasonal and emergency restrictions when conditions warrant. Decisions concerning electric bicycles should consider the particular trail, surrounding habitat, and other users, while meeting disability access obligations.

5. **Evaluate watershed effects at a useful geographic scale.** Include Kentucky case studies assessing route density, drainage connections to streams, crossing condition, sediment delivery, aquatic passage, and downstream drinking water and recreation. Examine heavy rainfall, saturated soils, and foreseeable maintenance shortfalls. Consider the combined effects of multiple route decisions within a watershed and explain the limits of available information. Compare alternatives using measurable water and habitat outcomes alongside access benefits and costs.

6. **Preserve public participation and agency coordination.** Provide notice, accessible maps, an opportunity to comment, and a reasoned written decision before substantive changes to route status or permitted uses. Limit simplified clerical procedures to corrections which do not change lawful use. Engage the Kentucky Division of Water, Kentucky Department of Fish and Wildlife Resources, affected Tribal governments, local governments, water utilities, watershed organizations, and recreation users. Publish current digital and printable maps with vehicle permissions and seasonal restrictions clearly identified.

Kentucky provides concrete reasons to retain strong watershed safeguards. The Daniel Boone National Forest encompasses portions of the Licking, Kentucky, and Cumberland river systems. A Forest Service aquatic assessment published in 2001 (Danieal Boone Aquatic Resources Assessment) documented increased sediment loads and harm to aquatic life associated with off highway vehicle use. It described old extraction roads and railbeds in stream bottoms, repeated crossings without channel protection, and routes reopened informally after vegetation had begun reclaiming them. These historical findings warrant updated investigation and should inform the agency's evaluation of abandoned and unauthorized routes.

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The consequences matter to familiar Kentucky destinations. The Forest Service identifies the Cumberland, Licking, Red, and Rockcastle rivers, along with Cave Run Lake and Laurel River Lake, as important settings for water recreation. Travel decisions should preserve dependable access to these places while preventing avoidable damage to their tributaries, banks, and aquatic habitat.

KWA's restoration partnerships demonstrate why travel management should account for investments in watershed recovery. The Forest Service's Watershed Condition Framework report identifies KWA among the partners supporting work in the Swift Camp Creek watershed in the Red River Gorge, including removal of trash from 11 miles of streams. Sustaining these improvements requires managing access in ways which prevent recurring pollution and allow effective maintenance and enforcement. The environmental impact statement should examine whether proposed changes could increase dumping, erosion, or restoration costs, and identify measures to protect the public funding, volunteer labor, and community resources already invested in these waters.

Land Between the Lakes National Recreation Area demonstrates the connection between travel management on federal lands and the condition of downstream waters. The Forest Service's Land Between the Lakes Aquatic Resource Assessment documents streams flowing from the recreation area into Kentucky Lake and Lake Barkley. These streams provide pathways for sediment from roads, drainage outlets, and disturbed crossings to reach the lakes. The environmental impact statement should evaluate these connected drainage systems, including the combined effects of multiple routes within a watershed. KWA asks the agency to identify where maintenance, crossing improvements, or seasonal restrictions would reduce sediment delivery and protect the water quality supporting fishing, boating, and other recreation.

Kentucky's steep slopes, narrow stream valleys, and karst terrain make the location and intensity of motorized access important to water quality. Expanding access without adequate drainage, maintenance, and route restrictions could increase erosion and carry sediment into streams, particularly where roads follow valley bottoms or cross waterways. In karst areas, runoff can also enter sinkholes and underground passages, carrying pollution beyond the visible route to springs, wells, and connected streams. The Kentucky Division of Water identifies rapid groundwater movement and limited natural filtration as sources of vulnerability in these landscapes. Removing damage minimization standards while encouraging additional motorized access could increase these risks, including impacts difficult to detect through surface inspection alone. The environmental impact statement should evaluate how expanded use could affect connected surface water and groundwater systems and retain safeguards suited to Kentucky's and other similarly situated state's terrain.

The National Wildlife Federation's *Forests and Water* assessment emphasizes protecting water sources and managing headwaters, rivers, and groundwater as connected systems. Although focused on western forests, this approach applies nationwide because effective watershed protection depends on understanding each location's terrain, hydrology, and habitat. These differences support retaining the current presumption limiting motorized travel to designated routes, so local managers can evaluate potential impacts before authorizing additional access. KWA asks the Forest Service to preserve this framework, combining national conservation standards with decisions grounded in the conditions of individual forests and watersheds.

KWA supports improvements which make public access more dependable and management more transparent. The environmental impact statement should compare the proposed framework with a practical alternative retaining watershed safeguards and public review while improving maintenance, mapping, and accessibility. Please use Kentucky's documented experience with stream damage and watershed restoration to evaluate these alternatives and retain clear national protections for the waters flowing through and beyond National Forest System lands.

Sincerely,
Nick Hart
Water Policy Director
Kentucky Waterways Alliance